

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF

v.

CIVIL ACTION NO. 3:20-cv-415-DPJ-FKB

REAL PROPERTY KNOWN AS  
115 ROSEDOWNE BEND, MADISON,  
MISSISSIPPI 39110,

DEFENDANT PROPERTY

**UNOPPOSED MOTION FOR PROTECTIVE ORDER**

The United States of America respectfully moves this Court to enter the attached proposed Protective Order (Exhibit 1). The Complaint for Forfeiture *in Rem* and accompanying Affidavit (Complaint) are currently under seal. Doc. 1. The Court has granted the Government's motion to allow for the distribution of the Complaint to Ted DiBiase Jr., Scott Gilbert, Kristen DiBiase, and any future counsel of Ms. DiBiase to allow for possible resolution of a matter related to the defendant property. The entry of the Protective Order will allow for the parties to address the matter on the defendant property but still ensure that the otherwise sealed nature of the Complaint remains.

**CERTIFICATE OF CONFERENCE**

I certify that on July 7, 2020, I communicated with Scott Gilbert, who represents Ted DiBiase Jr., via email and Ms. DiBiase, who is unrepresented, via email in regard to this motion. Scott Gilbert, on behalf of Ted DiBiase Jr., and Ms. DiBiase, in her personal capacity, consented to the entry of a Protective Order on the Complaint. I further forwarded a copy of this motion and the Protective Order to Scott Gilbert and Ms. DiBiase for comments or corrections prior to the filing of this motion.

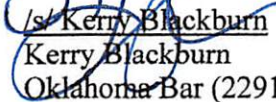
**CONCLUSION**

Based on the foregoing, the United States of America respectfully requests that the Court grant the Protective Order.

Dated: Tuesday, July 14, 2020

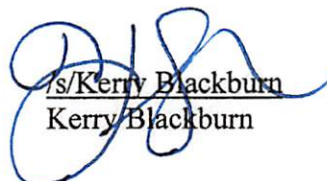
Respectfully submitted,

Deborah Connor, Chief  
Money Laundering and Asset Recovery Section  
Criminal Division  
U.S. Department of Justice

By:   
/s/ Kerry Blackburn  
Kerry Blackburn  
Oklahoma Bar (22918)  
Trial Attorney  
Money Laundering and Asset Recovery Section  
Criminal Division  
U.S. Department of Justice  
[Kerry.Blackburn2@usdoj.gov](mailto:Kerry.Blackburn2@usdoj.gov)

**CERTIFICATE OF SERVICE**

I, Kerry Blackburn, hereby certify that a copy of this motion will be provided to Scott Gilbert and Ms. DiBiase via email.

  
/s/ Kerry Blackburn  
Kerry Blackburn